



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

SEP 26 2007

REPLY TO THE ATTENTION OF

(AE-17J)

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Mr. James Larson  
Vice President of Operations  
Ross Incineration Services, Inc.  
36790 Giles Road  
Grafton, Ohio 44044-9125

Re: Notice of Violation and Finding of Violation

Dear Mr. Larson:

This letter advises you that the U. S. Environmental Protection Agency (EPA or we) has determined that the Ross Incineration Services, Inc. (Ross) facility at 36790 Giles Road, Grafton, Ohio (facility) is in violation of the Clean Air Act (CAA) and the National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors (40 C.F.R. 63, Subpart EEE, hereinafter, the HWC MACT). We have provided a list of the requirements violated below. We are today issuing to you a Notice of Violation and Finding of Violation (NOV/FOV) for these violations.

Section 112 of the CAA sets forth a list of one hundred and eighty-nine air pollutants and directs the EPA Administrator to promulgate emission standards for sources that emit those pollutants. On September 30, 1999, EPA promulgated the HWC MACT to control the emissions of tetra-, penta-, hexa-, hepta-, and octa-chlorinated dibenzo-dioxins and furans, mercury, lead, cadmium, arsenic, beryllium, chromium, carbon monoxide, hydrogen chloride/chlorine gas and particulate matter and to ensure a high destruction and removal efficiency. Ross' Title V permit incorporates these emission standards.

The HWC MACT requires the owner or operator of a hazardous waste incinerator must establish and comply with the following operating parameter limits (OPLs):

1. minimum quench inlet header flow rate;

2. minimum rotary kiln temperature;
3. minimum main chamber temperature;
4. maximum stack flow rate;
5. maximum main chamber total waste feed rate;
6. maximum main chamber pumpable waste feed rate;
7. minimum rotary kiln lance atomizing air pressure;
8. minimum main chamber burner atomizing air pressure;
9. maximum mercury feed rate;
10. minimum radial flow scrubber (RFS) pressure drop (DP);
11. maximum closed loop specific gravity;
12. minimum RFS liquid to gas ratio (L/G);
13. minimum wet electrostatic precipitator (ESP) #1 power;
14. minimum wet ESP #2 power;
15. maximum total chlorine/chloride feed;
16. minimum gas-liquid GLC (GLC) DP;
17. minimum GLC outlet scrubber liquor pH;
18. minimum GLC L/G; and
19. minimum rotary kiln pressure.

Ross' Title V permit incorporates the requirements to establish and comply with these OPLs.

EPA finds that Ross has violated the above listed HWC MACT requirements as incorporated into the Ross' Title V Permit. Because Ross violated its Title V permit, you have also violated Title V of the CAA and its associated regulations which require compliance with the terms and conditions of Title V permits.

Section 113 of the CAA gives us several enforcement options to resolve these violations, including: issuing an administrative compliance order; issuing an administrative penalty order, bringing a judicial civil action, and bringing a judicial criminal action.

Before we decide which enforcement option is appropriate, Section 113 of the CAA provides you with the opportunity to request a conference with us about the violations alleged in the FOV. This conference will provide you a chance to present information on the identified violations, any efforts you have taken to comply, and the steps you will take to prevent future violations. Please plan for your facility's technical and management personnel to take part in these discussions. You may have an attorney represent and accompany you at this conference.

The EPA contact in this matter is Charles Hall. You may call him at (312) 353-3443 if you wish to request a conference. EPA

hopes that this FOV/NOV will encourage Ross' compliance with the requirements of the CAA.

Sincerely yours,



Stephen Rothblatt, Director  
Air and Radiation Division

Enclosure

cc: Robert Hodanbosi, Chief  
Division of Air Pollution Control  
Ohio Environmental Agency

Dennis Bush, Air Pollution Control Supervisor  
Northeast District Office  
Ohio Environmental Protection Agency

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5

## **NOTICE AND FINDING OF VIOLATION**

Ross Incineration Services, Inc. (you or Ross), owns and operates a hazardous waste incinerator at 36790 Giles Road, Grafton, Ohio (Facility). The Ohio Environmental Protection Agency (Ohio EPA) designates the hazardous waste incinerator as source number 02-47-05-0278 N001.

EPA is sending this Notice of Violation and Finding of Violation (NOV/FOV) to you for violations of the following emission standards: tetra-, penta-, hexa-, hepta-, and octa-chlorinated dibenzo-dioxins and furans (collectively, dioxins/furans) and carbon monoxide. EPA is also sending this NOV/FOV to you for violations of the following operating parameter limits (OPLs): minimum quench inlet header flow rate; minimum rotary kiln temperature; minimum main chamber temperature; maximum flue gas flow rate; maximum main chamber total waste feed rate; maximum main chamber pumpable waste feed rate; minimum rotary kiln lance atomizing air pressure; minimum main chamber burner atomizing air pressure; maximum mercury feed rate; minimum radial flow scrubber (RFS) pressure drop (DP); maximum closed loop specific gravity; minimum RFS liquid to gas ratio (L/G); minimum wet electrostatic precipitator (ESP) #1 power; minimum wet ESP #2 power; maximum total chlorine/chloride feed rate; minimum gas-liquid contactor (GLC) DP; minimum GLC outlet scrubber liquor pH; minimum GLC L/G; and minimum kiln pressure.

The underlying statutory and regulatory requirements include provisions of the CAA and its implementing regulations.

Section 113 of the CAA provides you with the opportunity to request a conference with us to discuss the violations alleged in the NOV/FOV. This conference will provide you a chance to present information on the identified violations, any efforts you have taken to comply, and the steps you will take to prevent

future violations. Please plan for the Facility's technical and management personnel to take part in these discussions. You may have an attorney represent and accompany you at this conference.

### **Explanation of Violations**

The following provides a description of the regulations Ross violated and how Ross violated them:

1. On September 30, 1999, EPA promulgated the National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors (hereinafter, the HWC MACT). EPA amended the HWC MACT on November 19, 1999, July 10, 2000, November 9, 2000, May 14, 2001, July 3, 2001, December 6, 2001, February 13, 2002, February 14, 2002, December 19, 2002, April 9, 2004, June 23, 2003, October 12, 2005, April 20, 2006, and October 25, 2006.
2. On May 30, 2003, Ohio EPA issued to Ross Title V Permit 02-47-05-0278 (Title V Permit). The Title V permit requires Ross to comply with the emission standards for dioxins/furans and carbon monoxide. The Title V permit also requires Ross to establish and comply with various OPLs.
3. Pursuant to 40 C.F.R. § 63.1206(a)(1)(i)(A) and a compliance extension that Ohio EPA granted pursuant to 40 C.F.R. § 63.1213, Ross must comply with the emission standards under §§ 63.1203 and the other requirements of this subpart no later than September 30, 2004.
4. Pursuant to 40 C.F.R. § 63.1206(b)(1), the emission standards and operating requirements set forth in this subpart apply at all times except:
  - (i) During periods of startup, shutdown, and malfunction; and
  - (ii) When hazardous waste is not in the combustion chamber (i.e., the hazardous waste feed to the combustor has been cut off for a period of time not less than the hazardous waste residence time)....
5. Pursuant to 40 C.F.R. § 63.1211(c)(1), Ross developed and included in its operating record a Document of Compliance (DOC). Pursuant to 40 C.F.R. § 63.1211(c)(2), the DOC identified the applicable emission standards and the

applicable OPLs that will ensure compliance with those emission standards. On February 3, 2006, Ross confirmed the OPL values in the DOC.

6. Pursuant to 40 C.F.R. § 63.1207(j)(1)(i), on August 4, 2006, Ross submitted its Notification of Compliance (NOC) documenting compliance with the emission standards and continuous monitoring system requirements, and identifying OPLs. On August 10, 2006, EPA received the NOC.
7. Pursuant to 40 C.F.R. § 63.1211(c)(4), Ross must comply with the emission standards and OPLs specified in the DOC after September 30, 2004. Pursuant to 40 C.F.R. § 63.1207(j)(1)(ii), upon postmark of the NOC, Ross must comply with all operating requirements specified in the NOC in lieu of the limits specified in the DOC required under § 63.1211(c).
8. Pursuant to 40 C.F.R. § 63.1203(a)(1)(ii), Ross must not discharge or cause combustion gases to be emitted into the atmosphere that contain dioxins/furans in excess of 0.40 nanogram toxic equivalent per dry standard cubic meter corrected to 7 percent oxygen (ng TEQ/dscm @ 7% O<sub>2</sub>).
9. Between February 6 and 9, 2006, Ross conducted a comprehensive performance test under two operating conditions.
10. On February 6 and 8, 2006, Ross conducted the low temperature test condition performance test for dioxins/furans using Sampling Method for Polychlorinated Dibenzo-p-Dioxins and Polychlorinated Dibenzofurans emissions from Stationary Sources, EPA Publication SW-846 (hereinafter, Method 0023A). The average dioxin/furan emission concentration was 0.65 ng TEQ/dscm @ 7% O<sub>2</sub>.
11. On May 9, 2006, Ross conducted a low temperature test condition performance test using Method 0023A. The average dioxin/furan emission concentration was 0.32 ng TEQ/dscm @ 7% O<sub>2</sub>.
12. Thus, between February 8 and May 9, 2006, Ross discharged into the atmosphere combustion gases that contained dioxins/furans in excess of 0.40 ng TEQ/dscm @ 7% O<sub>2</sub> in violation of 40 C.F.R. § 63.1203(a)(1)(ii) and its Title V permit.

13. Pursuant to 40 C.F.R. § 63.1203(a)(5)(i), Ross must not discharge or cause combustion gases to be emitted into the atmosphere that contain carbon monoxide in excess of 100 parts per million by Volume dry basis and corrected to 7 percent oxygen (ppmV,d @ 7% O<sub>2</sub>), as a 1-hour rolling average (monitored continuously with a continuous emission monitoring system (CEMS)).
14. Pursuant to 40 C.F.R. §§ 63.1209(a)(1)(i) and 63.1209(a)(2), Ross installed, operates, calibrates and maintains a carbon monoxide CEMS to demonstrate compliance with the emission standard set forth in 40 C.F.R. § 63.1203(a)(5)(i).
15. During the dates and times listed in Table 1 in Appendix A, Ross measured carbon monoxide at concentrations greater than 100 ppmV,d @ 7% O<sub>2</sub>.
16. During the dates and times listed in Table 1 of Appendix A, Ross discharged or caused combustion gases to be emitted into the atmosphere that contain carbon monoxide in excess of 100 ppmV,d @ 7% O<sub>2</sub> in violation of 40 C.F.R. § 63.1203(a)(5)(i) and its Title V permit.
17. Pursuant to 40 C.F.R. § 63.1209(g)(2), EPA and Ohio EPA determined during their review of the results of the February 2006 dioxin/furan performance test that Ross needed to establish a minimum quench inlet header flow rate OPL in order to document compliance with the HWC MACT's dioxin/furan emission standards. The 1-hour rolling average quench inlet header flow rate during the May 2006 dioxin/furan performance test was 544 gallons per minute. In its August 4, 2006, NOC Ross established a minimum quench inlet header flow rate OPL of 544 gallons per minute as a 1-hour rolling average.
18. During the dates and times listed in Table 2 of Appendix A, the 1-hour rolling average quench inlet header flow rate was less than 544 gallons per minute after August 4, 2006.
19. During the dates and times listed in Table 2 of Appendix A, Ross exceeded the minimum quench inlet header flow rate OPL in violation of 40 C.F.R. § 63.1209(g)(2) and its Title V permit.
20. Pursuant to 40 C.F.R. §§ 63.1209(j)(1) and 63.1209(k)(2), the minimum rotary kiln temperature OPL was 1500 degrees

Fahrenheit ( $^{\circ}$ F) as a 1-hour rolling average between September 30, 2004, and August 4, 2006, and has been 1522 $^{\circ}$ F as a 1-hour rolling average since August 4, 2006.

21. During the dates and times listed in Table 3 of Appendix A, the 1-hour average rotary kiln temperature was less than 1500 $^{\circ}$ F between September 30, 2004, and August 4, 2006; and was less than 1522 $^{\circ}$ F after August 4, 2006.
22. During the dates and times listed in Table 3 of Appendix A, Ross exceeded the minimum rotary kiln temperature OPL in violation of 40 C.F.R. §§ 63.1209(j)(1) and 63.1209(k)(2) and its Title V permit.
23. Pursuant to 40 C.F.R. §§ 63.1209(j)(1) and 63.1209(k)(2), the minimum main chamber temperature OPL was 1700 $^{\circ}$ F as a 1-hour rolling average between September 30, 2004, and August 4, 2006, and has been 1829 $^{\circ}$ F as a 1-hour rolling average since August 4, 2006.
24. During the dates and times listed in Table 4 of Appendix A, the 1-hour average main chamber temperature was less than 1700 $^{\circ}$ F between September 30, 2004, and August 4, 2006; and was less than 1829 $^{\circ}$ F after August 4, 2006.
25. During the dates and times listed in Table 4 of Appendix A, Ross exceeded the minimum main chamber temperature OPL in violation of 40 C.F.R. §§ 63.1209(j)(1) and 63.1209(k)(2) and its Title V permit.
26. Pursuant to 40 C.F.R. §§ 63.1209(j)(2), 63.1209(k)(3), 63.1209(m)(2), 63.1209(n)(5), and 63.1209(o)(2), the maximum stack gas flow rate OPL was 50.4 thousand actual cubic feet per minute (kacfpm) as a 1-hour rolling average between September 30, 2004, and August 4, 2006; and has been 52.3 kacfpm as a 1-hour rolling average after August 4, 2006.
27. During the dates and times listed in Table 5 of Appendix A, the 1-hour average flue gas flow rate was less than 50.4 kacfpm between September 30, 2004, and August 4, 2006; and was less than 52.3 kacfpm after August 4, 2006.
28. During the dates and times listed in Table 5 of Appendix A, Ross exceeded the maximum flue gas flow rate OPL in violation of 40 C.F.R. §§ 63.1209(j)(2), 63.1209(k)(3),

63.1209(m)(2), 63.1209(n)(5), and 63.1209(o)(2) and its Title V permit.

29. Pursuant to 40 C.F.R. §§ 63.1209(j)(3) and 63.1209(k)(4), the maximum main chamber total hazardous waste feed rate OPL was 17,750 pounds per hour (lbs/hr) as a 12-hour rolling average between September 30, 2004, and August 4, 2006, and has been 18,815 lbs/hr as a 12-hour rolling average since August 4, 2006.
30. During the dates and times listed in Table 6 of Appendix A, the 12-hour average main chamber total hazardous waste feed rate was greater than 17,750 lbs/hr between September 30, 2004, and August 4, 2006.
31. During the dates and times listed in Table 6 of Appendix A, Ross exceeded the maximum main chamber total hazardous waste feed rate OPL in violation of 40 C.F.R. §§ 63.1209(j)(3) and 63.1209(k)(4) and its Title V permit.
32. Pursuant to 40 C.F.R. §§ 63.1209(j)(3) and 63.1209(k)(4), the maximum main chamber pumpable waste feed rate OPL was 12,900 lbs/hr as a 12-hour rolling average between September 30, 2004, and August 4, 2006, and has been 12,852 lbs/hr as a 12-hour rolling average since August 4, 2006.
33. During the dates and times listed in Table 7 of Appendix A, the 12-hour average main chamber pumpable waste feed rate was greater than 12,900 lbs/hr between September 30, 2004, and August 4, 2006; and was greater than 12,852 lbs/hr after August 4, 2006.
34. During the dates and times listed in Table 7 of Appendix A, Ross exceeded the maximum main chamber pumpable waste feed rate OPL in violation of 40 C.F.R. §§ 63.1209(j)(3) and 63.1209(k)(4) and its Title V permit.
35. Pursuant to 40 C.F.R. § 63.1209(j)(4), the minimum rotary kiln lance atomizing air pressure OPL has been 30 inches of water column ( H<sub>2</sub>O) as an instantaneous measurement since September 30, 2004.
36. During the dates and times listed in Table 8 of Appendix A, the 1-minute average rotary kiln lance atomizing air pressure was less than 30" H<sub>2</sub>O after September 30, 2004.

37. During the dates and times listed in Table 8 of Appendix A, Ross exceeded the minimum rotary kiln lance atomizing air pressure OPL in violation of 40 C.F.R. § 63.1209(j)(4) and its Title V permit.
38. Pursuant to 40 C.F.R. § 63.1209(j)(4), the minimum main chamber burner atomizing air pressure OPL has been 28" H<sub>2</sub>O as an instantaneous measurement since September 30, 2004.
39. During the dates and times listed in Table 9 of Appendix A, the 1-minute average main chamber burner atomizing air pressure was less than 28" H<sub>2</sub>O after September 30, 2004.
40. During the dates and times listed in Table 9 of Appendix A, Ross exceeded the minimum main chamber burner atomizing air pressure OPL in violation of 40 C.F.R. § 63.1209(j)(4) and its Title V permit.
41. Pursuant to 40 C.F.R. § 63.1209(1)(1), the maximum mercury feed rate OPL has been 0.0135 lb/hr as a 12-hour rolling average since August 4, 2006.
42. During the dates and times listed in Table 10 of Appendix A, the 12-hour rolling average mercury feed rate was greater than 0.0135 lb/hr after August 4, 2006.
43. During the dates and times listed in Table 10 of Appendix A, Ross exceeded the maximum mercury feed rate OPL in violation of 40 C.F.R. § 63.1209(1)(1) and its Title V permit.
44. Pursuant to 40 C.F.R. § 63.1209(m)(1)(i)(A), the minimum RFS DP OPL has been 17.0" H<sub>2</sub>O as a 1-hour rolling average since September 30, 2004.
45. During the dates and times listed in Table 11 of Appendix A, the 1-hour average RFS DP was less than 17.0" H<sub>2</sub>O after September 30, 2004.
46. During the dates and times listed in Table 11 of Appendix A, Ross exceeded the minimum RFS DP OPL in violation of 40 C.F.R. § 63.1209(m)(1)(i)(A) and its Title V permit.
47. Pursuant to 40 C.F.R. § 63.1209(m)(1)(i)(B), the maximum closed loop solids content OPL was a specific gravity of

- 1.12 (dimensionless) as a 12-hour rolling average between September 30, 2004, and August 4, 2006.
48. During the dates and times listed in Table 12 of Appendix A, the 12-hour average closed loop solids content specific gravity was greater than 1.12 (dimensionless) between September 30, 2004, and August 4, 2006.
49. During the dates and times listed in Table 12 of Appendix A, Ross exceeded the maximum closed loop solids content OPL in violation of 40 C.F.R. § 63.1209(m)(1)(i)(B) and its Title V permit.
50. Pursuant to 40 C.F.R. § 63.1209(m)(1)(i)(C), the minimum RFS L/G OPL was 17.3 gallons per thousand actual cubic feet (gal/kacf) as a 1-hour rolling average between September 30, 2004, and August 4, 2006, and has been 17.0 gal/kacf as a 1-hour rolling average since August 4, 2006.
51. During the dates and times listed in Table 13 of Appendix A, the 1-hour average RFS L/G was less than 17.3 gal/kacf between September 30, 2004, and August 4, 2006; and was less than 17.0 gal/kacf after August 4, 2006.
52. During the dates and times listed in Table 13 of Appendix A, Ross exceeded the minimum RFS L/G OPL in violation of 40 C.F.R. § 63.1209(m)(1)(i)(C) and its Title V permit.
53. Pursuant to 40 C.F.R. § 63.1209(m)(1)(iv), the minimum wet ESP #1 power OPL has been 0.5 kilovolt-ampere (kVA) as a 1-hour rolling average since August 4, 2006.
54. During the dates and times listed in Table 14 of Appendix A, the 1-hour average wet ESP #1 power was less than 0.5 kVA after August 4, 2006.
55. During the dates and times listed in Table 14 of Appendix A, Ross exceeded the minimum wet ESP #1 power OPL in violation of 40 C.F.R. § 63.1209(m)(1)(iv) and its Title V permit.
56. Pursuant to 40 C.F.R. § 63.1209(m)(1)(iv), the minimum wet ESP #2 power OPL has been 12 kVA as a 1-hour rolling average since August 4, 2006.

57. During the dates and times listed in Table 15 of Appendix A, the 1-hour average wet ESP #2 power was less than 12 kVA after August 4, 2006.
58. During the dates and times listed in Table 15 of Appendix A, Ross exceeded the minimum wet ESP #2 power OPL in violation of 40 C.F.R. § 63.1209(m)(1)(iv) and its Title V permit.
59. Pursuant to 40 C.F.R. § 63.1209(o)(1)(i), the maximum total chlorine and chloride feed rate OPL was 2,000 lbs/hr as a 12-hour rolling average between September 30, 2004, and August 4, 2006.
60. During the dates and times listed in Table 16 of Appendix A, the 12-hour average total chlorine and chloride feed rate was greater than 2,000 lbs/hr between September 30, 2004, and August 4, 2006.
61. During the dates and times listed in Table 16 of Appendix A, Ross exceeded the maximum total chlorine and chloride feed rate OPL in violation of 40 C.F.R. § 63.1209(o)(1)(i) and its Title V permit.
62. Pursuant to 40 C.F.R. § 63.1209(o)(3)(i), the minimum GLC DP OPL has been 0.75" H<sub>2</sub>O as a 1-hour rolling average since September 30, 2004.
63. During the dates and times listed in Table 17 of Appendix A, the 1-hour average GLC DP was less than 0.75" H<sub>2</sub>O after September 30, 2004.
64. During the dates and times listed in Table 17 of Appendix A, Ross exceeded the minimum GLC DP OPL in violation of 40 C.F.R. § 63.1209(o)(3)(i) and its Title V permit.
65. Pursuant to 40 C.F.R. § 63.1209(o)(3)(iv), the minimum GLC outlet scrubber liquor pH OPL has been 6.0 (dimensionless) as a 1-hour rolling average since September 30, 2004.
66. During the dates and times listed in Table 18 of Appendix A, the 1-hour average GLC outlet scrubber liquor pH was less than 6.0 after September 30, 2004.
67. During the dates and times listed in Table 18 of Appendix A, Ross exceeded the minimum GLC outlet scrubber

liquor pH OPL in violation of 40 C.F.R. § 63.1209(o)(3)(iv) and its Title V permit.

68. Pursuant to 40 C.F.R. C.F.R. § 63.1209(o)(3)(v), the minimum GLC L/G OPL was 45.3 gal/kacf as a 1-hour rolling average between September 30, 2004, and August 4, 2006, and has been 49.8 gal/kacf as a 1-hour rolling average since August 4, 2006.
69. During the dates and times listed in Table 19 of Appendix A, the 1-hour average GLC L/G was less than 45.3 gal/kacf between September 30, 2004, and August 4, 2006; and was less than 49.8 gal/kacf after August 4, 2006.
70. During the dates and times listed in Table 19 of Appendix A, Ross exceeded the minimum GLC L/G OPL in violation of 40 C.F.R. § 63.1209(o)(3)(v) and its Title V permit.
71. Pursuant to 40 C.F.R. § 63.1209(p), the maximum rotary kiln pressure OPL was 0.0" H<sub>2</sub>O as an instantaneous measurement between September 30, 2004, and August 4, 2006, and has been -0.05" H<sub>2</sub>O as an instantaneous measurement since August 4, 2006.
72. During the dates and times listed in Table 20 of Appendix A, the 1-minute average rotary kiln pressure was greater than 0.0" H<sub>2</sub>O between September 30, 2004, and August 4, 2006; and was greater than -0.05" H<sub>2</sub>O after August 4, 2006.
73. During the dates and times listed in Table 20 of Appendix A, Ross exceeded the maximum rotary kiln pressure OPL in violation of 40 C.F.R. § 63.1209(p) and its Title V permit.

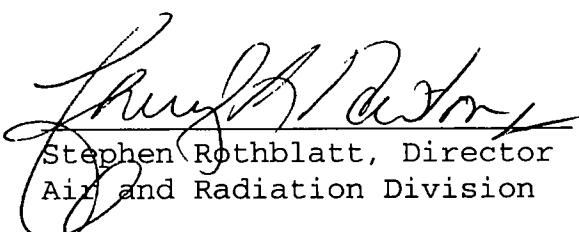
#### **Environmental Impact of Violations**

74. CO reduces oxygen delivery to the body's organs and tissues. CO contributes to the formation of ground-level ozone, which can trigger serious respiratory problems.
75. 2,3,7,8-tetrachlorodibenzo-dioxin (2,3,7,8-TCDD) is the most toxic of the dioxins/furans. It causes chloracne in humans, a severe acne-like condition. It is known to be a developmental toxicant in animals, causing skeletal deformities, kidney defects, and weakened immune responses

in the offspring of animals exposed to 2,3,7,8-TCDD during pregnancy. Human studies have shown an association between 2,3,7,8-TCDD and soft-tissue sarcomas, lymphomas, and stomach carcinomas. EPA has classified 2,3,7,8-TCDD as a probable human carcinogen.

76. Acute inhalation exposure hydrogen chloride (HCl) may cause eye, nose, and respiratory tract irritation and inflammation and pulmonary edema in humans. Acute oral exposure may cause corrosion of the mucous membranes, esophagus, and stomach and dermal contact may produce severe burns, ulceration, and scarring in humans. Chronic occupational exposure to HCl has been reported to cause gastritis, chronic bronchitis, dermatitis, and photosensitization in workers.
77. Acute exposure to high levels of elemental mercury in humans results in central nervous system (CNS) effects such as tremors, mood changes, and slowed sensory and motor nerve function. Chronic exposure to elemental mercury in humans also affects the CNS, with effects such as erethism (increased excitability), irritability, excessive shyness, and tremors.
78. Particle pollution - especially fine particles - contains microscopic solids or liquid droplets that can penetrate the lungs and cause serious health problems. Numerous scientific studies have linked particle pollution exposure to a variety of problems, including: increased respiratory symptoms, such as irritation of the airways, coughing, or difficulty breathing, for example; decreased lung function; aggravated asthma; development of chronic bronchitis; irregular heartbeat; nonfatal heart attacks; and premature death in people with heart or lung disease.

9/26/07  
Date



Stephen Rothblatt, Director  
Air and Radiation Division

## APPENDIX A

Table 1. Exceedances of the Carbon Monoxide Emission Standard

Start Date/Time	End Date/Time	Duration (hh:mm)	Note
10/02/2004 17:14	10/02/2004 17:52	0:39	
10/25/2004 17:48	10/25/2004 18:27	0:40	
10/30/2004 22:33	10/31/2004 00:55	2:23	
11/05/2004 11:51	11/05/2004 12:28	0:38	
12/06/2004 23:52	12/07/2004 03:28	3:37	
12/12/2004 11:09	12/12/2004 12:08	1:00	
12/13/2004 06:32	12/13/2004 08:19	1:48	
12/16/2004 08:12	12/16/2004 10:01	1:50	
12/16/2004 10:09	12/16/2004 18:54	8:46	
12/16/2004 19:10	12/16/2004 21:04	1:55	
12/17/2004 00:23	12/17/2004 01:17	0:55	
12/20/2004 02:24	12/20/2004 03:19	0:56	
12/21/2004 17:11	12/21/2004 18:10	1:00	
12/23/2004 17:19	12/23/2004 17:19	0:01	
12/29/2004 11:18	12/29/2004 11:27	0:10	
12/31/2004 03:55	12/31/2004 08:08	4:14	
12/31/2004 10:49	12/31/2004 10:55	0:07	
12/31/2004 22:13	12/31/2004 23:05	0:53	
01/12/2005 12:36	01/12/2005 13:35	1:00	
01/26/2005 17:47	01/26/2005 21:56	4:10	1
01/27/2005 22:25	01/27/2005 22:25	0:01	
02/17/2005 19:23	02/17/2005 20:25	1:03	
02/18/2005 00:27	02/18/2005 01:51	1:25	
02/19/2005 10:48	02/19/2005 11:47	1:00	
02/25/2005 18:52	02/25/2005 19:53	1:02	
03/14/2005 03:44	03/14/2005 09:01	5:18	1
03/14/2005 12:45	03/14/2005 13:40	0:56	1
03/17/2005 04:00	03/17/2005 09:30	5:31	
03/17/2005 09:57	03/17/2005 11:27	1:31	
03/17/2005 11:32	03/17/2005 13:47	2:16	
03/17/2005 16:30	03/17/2005 16:52	0:23	
03/17/2005 17:13	03/17/2005 17:37	0:25	
03/17/2005 20:03	03/17/2005 20:03	0:01	
03/19/2005 13:07	03/19/2005 13:56	0:50	
03/29/2005 08:48	03/29/2005 09:47	1:00	
04/03/2005 00:31	04/03/2005 01:27	0:57	
04/04/2005 03:52	04/04/2005 04:46	0:55	
04/09/2005 10:59	04/09/2005 12:00	1:02	
04/09/2005 12:17	04/09/2005 13:08	0:52	
04/14/2005 21:04	04/15/2005 01:17	4:14	
04/18/2005 22:57	04/19/2005 03:05	4:09	

Table 1. Exceedances of the Carbon Monoxide Emission Standard

Start Date/Time	End Date/Time	Duration (hh:mm)	Note
04/29/2005 16:06	04/29/2005 17:27	1:22	
05/09/2005 04:20	05/09/2005 05:00	0:41	
05/13/2005 00:08	05/13/2005 00:37	0:30	
05/14/2005 08:50	05/14/2005 09:18	0:29	
06/05/2005 17:43	06/05/2005 18:02	0:20	
06/09/2005 02:35	06/09/2005 05:29	2:55	
06/09/2005 05:41	06/09/2005 06:03	0:23	
06/09/2005 06:15	06/09/2005 08:43	2:29	
06/09/2005 08:56	06/09/2005 10:03	1:08	
06/27/2005 12:36	06/27/2005 13:35	1:00	
07/04/2005 13:45	07/04/2005 14:44	1:00	
07/15/2005 22:40	07/15/2005 23:46	1:07	
07/17/2005 19:59	07/17/2005 20:50	0:52	
07/26/2005 12:14	07/26/2005 13:13	1:00	
07/26/2005 20:24	07/26/2005 21:23	1:00	
08/01/2005 05:09	08/01/2005 06:04	0:56	
08/03/2005 08:55	08/03/2005 09:04	0:10	
08/03/2005 09:08	08/03/2005 09:11	0:04	
08/03/2005 13:44	08/03/2005 15:24	1:41	
08/08/2005 02:36	08/08/2005 03:10	0:35	1
08/12/2005 10:49	08/12/2005 11:46	0:58	
08/20/2005 17:05	08/20/2005 18:01	0:57	
08/24/2005 07:24	08/24/2005 08:37	1:14	
09/07/2005 23:10	09/08/2005 02:38	3:29	
09/08/2005 06:23	09/08/2005 06:28	0:06	
09/08/2005 06:52	09/08/2005 08:15	1:24	
09/25/2005 11:43	09/25/2005 12:27	0:45	
09/25/2005 12:29	09/25/2005 17:48	5:20	
09/25/2005 18:39	09/25/2005 22:35	3:57	
10/02/2005 09:10	10/02/2005 10:07	0:58	
10/02/2005 21:58	10/02/2005 22:53	0:56	
10/04/2005 12:42	10/04/2005 13:41	1:00	
10/06/2005 14:04	10/06/2005 15:03	1:00	
10/07/2005 10:24	10/07/2005 10:27	0:04	
10/19/2005 17:29	10/19/2005 18:28	1:00	
10/22/2005 15:49	10/22/2005 16:14	0:26	
11/17/2005 11:51	11/17/2005 11:53	0:03	
11/17/2005 19:59	11/17/2005 20:57	0:59	
12/13/2005 13:55	12/13/2005 14:42	0:48	
12/17/2005 19:36	12/17/2005 20:13	0:38	
12/27/2005 04:54	12/27/2005 05:15	0:22	
12/28/2005 13:41	12/28/2005 15:54	2:14	
01/03/2006 03:27	01/03/2006 04:19	0:53	1

Table 1. Exceedances of the Carbon Monoxide Emission Standard

Start Date/Time	End Date/Time	Duration (hh:mm)	Note
01/03/2006 05:35	01/03/2006 07:51	2:17	1
01/06/2006 07:17	01/06/2006 09:56	2:40	
01/06/2006 12:08	01/06/2006 13:16	1:09	
01/06/2006 17:28	01/06/2006 19:24	1:57	
01/07/2006 01:43	01/07/2006 02:29	0:47	
01/17/2006 16:14	01/17/2006 17:26	1:13	
01/29/2006 04:20	01/29/2006 05:17	0:58	
02/17/2006 08:54	02/17/2006 09:45	0:52	
03/03/2006 01:29	03/03/2006 01:37	0:09	
03/03/2006 02:01	03/03/2006 02:27	0:27	
03/12/2006 21:48	03/12/2006 23:11	1:24	
03/12/2006 23:47	03/13/2006 01:36	1:50	
04/06/2006 11:17	04/06/2006 12:14	0:58	
04/06/2006 13:47	04/06/2006 14:19	0:33	
04/09/2006 13:06	04/09/2006 16:14	3:09	
04/15/2006 17:44	04/15/2006 18:04	0:21	
04/25/2006 07:36	04/25/2006 08:35	1:00	
05/03/2006 09:17	05/03/2006 09:25	0:09	
05/06/2006 11:33	05/06/2006 12:33	1:01	
05/07/2006 05:52	05/07/2006 06:51	1:00	
05/09/2006 22:38	05/10/2006 00:06	1:29	
05/10/2006 03:50	05/10/2006 05:30	1:41	1
05/27/2006 16:10	05/27/2006 16:46	0:37	
06/10/2006 19:21	06/10/2006 20:13	0:53	
06/26/2006 04:23	06/26/2006 08:28	4:06	
06/29/2006 11:47	06/29/2006 19:00	7:14	1
07/05/2006 14:54	07/05/2006 15:16	0:23	
07/12/2006 08:36	07/12/2006 09:35	1:00	
07/16/2006 21:42	07/16/2006 22:32	0:51	
07/31/2006 04:01	07/31/2006 05:00	1:00	1
08/12/2006 01:01	08/12/2006 01:57	0:57	
08/12/2006 06:11	08/12/2006 08:50	2:40	1
09/13/2006 12:32	09/13/2006 13:28	0:57	
09/13/2006 16:17	09/13/2006 17:20	1:04	
10/04/2006 14:19	10/04/2006 14:45	0:27	
10/06/2006 03:00	10/06/2006 03:59	1:00	1
10/17/2006 18:27	10/17/2006 19:35	1:09	1
11/03/2006 11:24	11/03/2006 13:22	1:59	
11/06/2006 00:33	11/06/2006 01:36	1:04	
11/06/2006 03:03	11/06/2006 03:19	0:17	1
11/06/2006 04:57	11/06/2006 06:28	1:32	1
11/06/2006 06:36	11/06/2006 10:28	3:53	1
11/09/2006 02:54	11/09/2006 08:41	5:48	

Table 1. Exceedances of the Carbon Monoxide Emission Standard

Start Date/Time	End Date/Time	Duration (hh:mm)	Note
11/09/2006 09:11	11/09/2006 11:04	1:54	
11/09/2006 18:26	11/09/2006 19:33	1:08	
11/10/2006 02:02	11/10/2006 02:37	0:36	
12/01/2006 17:05	12/01/2006 18:47	1:43	
12/22/2006 02:05	12/22/2006 04:22	2:18	
12/22/2006 06:45	12/22/2006 07:44	1:00	
12/22/2006 11:46	12/22/2006 12:54	1:09	
12/25/2006 18:30	12/25/2006 19:48	1:19	1
12/25/2006 20:48	12/25/2006 22:38	1:51	1
12/27/2006 18:00	12/28/2006 00:21	6:22	1
12/28/2006 08:41	12/28/2006 09:37	0:57	1
12/30/2006 16:42	12/30/2006 17:00	0:19	
01/06/2007 12:43	01/06/2007 12:54	0:12	
01/18/2007 16:12	01/18/2007 17:11	1:00	.
02/01/2007 11:22	02/01/2007 11:24	0:03	.
02/01/2007 13:19	02/01/2007 14:17	0:59	
02/05/2007 10:40	02/05/2007 21:57	11:18	
02/05/2007 23:48	02/05/2007 23:58	0:11	
02/06/2007 00:00	02/06/2007 02:05	2:06	
02/06/2007 02:49	02/06/2007 04:55	2:07	
02/06/2007 04:58	02/06/2007 06:47	1:50	
02/06/2007 07:16	02/06/2007 08:11	0:56	
02/15/2007 13:37	02/15/2007 14:36	1:00	
02/16/2007 01:22	02/16/2007 02:21	1:00	
02/26/2007 15:06	02/26/2007 15:39	0:34	

Note 1: Ross may have been in start up or shut down during this exceedance.

Table 2. Exceedances of the Minimum Quench Inlet Header Flow Rate OPL

Start Date/Time	End Date/Time	Duration (hh:mm)	Note
08/12/2006 08:41	08/12/2006 10:51	2:11	1
09/13/2006 12:32	09/13/2006 12:48	0:17	
10/17/2006 11:11	10/17/2006 15:31	4:21	
11/06/2006 04:06	11/06/2006 04:55	0:50	1
11/06/2006 10:30	11/06/2006 18:06	7:37	1
11/08/2006 17:09	11/09/2006 09:01	15:53	1
11/09/2006 11:29	11/09/2006 15:03	3:35	
12/22/2006 02:26	12/22/2006 07:19	4:54	
12/22/2006 10:17	12/22/2006 12:17	2:01	
12/26/2006 03:29	12/27/2006 17:41	38:13	1
12/28/2006 08:14	12/28/2006 09:10	0:57	1
02/17/2007 00:41	02/17/2007 05:16	4:36	

Note 1: Ross may have been in start up or shut down during this exceedance.

Table 3. Exceedances of the Minimum Rotary Kiln Temperature OPL

Start Date/Time	End Date/Time	Duration (hh:mm)	Note
10/30/2004 23:00	10/31/2004 01:28	2:29	
12/07/2004 00:07	12/07/2004 06:19	6:13	
12/13/2004 02:01	12/13/2004 13:03	11:03	
01/26/2005 18:34	01/27/2005 01:47	7:14	1
02/17/2005 19:46	02/18/2005 02:59	7:14	
03/14/2005 02:03	03/15/2005 14:20	36:18	1
03/16/2005 14:45	03/17/2005 15:43	24:59	1
03/17/2005 15:57	03/17/2005 18:14	2:18	
04/14/2005 21:43	04/15/2005 02:04	4:22	
04/18/2005 23:11	04/19/2005 03:19	4:09	
04/29/2005 16:38	04/29/2005 17:44	1:07	
06/05/2005 19:53	06/09/2005 14:38	90:46	1
06/29/2005 2:06	06/29/2005 22:41	0:36	
07/15/2005 22:22	07/15/2005 23:51	1:30	
08/03/2005 08:42	08/03/2005 19:09	10:28	
08/08/2005 02:32	08/09/2005 14:03	35:32	1
08/24/2005 06:04	08/24/2005 09:29	3:26	
09/07/2005 23:49	09/08/2005 09:23	9:35	1
11/10/2005 02:14	11/10/2005 05:50	3:37	
11/17/2005 12:17	11/17/2005 13:18	1:02	
11/17/2005 20:18	11/17/2005 22:13	1:56	

Table 3. Exceedances of the Minimum Rotary Kiln Temperature OPL

Start Date/Time	End Date/Time	Duration (hh:mm)	Note
12/27/2005 18:15	12/28/2005 18:48	24:34	1
01/03/2006 02:00	01/03/2006 13:56	11:57	1
01/05/2006 13:09	01/06/2006 23:29	34:21	1
01/17/2006 06:52	01/17/2006 17:23	0:32	
03/12/2006 22:16	03/13/2006 03:06	4:51	
03/23/2006 22:30	03/24/2006 11:21	12:52	1
03/24/2006 11:36	03/24/2006 21:08	9:33	1
04/03/2006 00:26	04/04/2006 10:10	33:45	1
04/06/2006 17:55	04/06/2006 23:17	5:23	1
04/09/2006 12:50	04/09/2006 12:58	0:09	
04/09/2006 13:00	04/09/2006 13:03	0:04	
04/09/2006 13:07	04/09/2006 13:09	0:03	
04/09/2006 13:14	04/09/2006 13:14	0:01	
04/09/2006 13:17	04/09/2006 13:34	0:18	
04/09/2006 13:36	04/09/2006 13:36	0:01	
04/09/2006 13:39	04/09/2006 13:41	0:03	
04/09/2006 13:45	04/09/2006 13:45	0:01	
04/09/2006 13:49	04/09/2006 13:51	0:03	
04/09/2006 14:03	04/09/2006 17:42	3:40	
04/15/2006 17:35	04/15/2006 23:19	5:45	
04/22/2006 05:18	04/22/2006 06:53	1:36	
05/05/2006 06:17	05/05/2006 06:29	0:13	
05/09/2006 22:43	05/10/2006 00:07	1:25	
05/10/2006 04:14	05/11/2006 12:07	31:54	
05/29/2006 23:51	05/30/2006 03:42	3:52	
06/26/2006 00:34	06/26/2006 08:57	8:24	1
06/28/2006 21:00	06/29/2006 20:04	23:05	1
06/29/2006 20:06	06/29/2006 22:32	2:27	1
08/12/2006 00:37	08/12/2006 10:51	10:15	1
09/13/2006 12:32	09/13/2006 15:07	2:36	
09/13/2006 16:02	09/13/2006 17:49	1:48	
10/17/2006 04:56	10/17/2006 21:51	16:56	1
11/03/2006 12:06	11/03/2006 13:22	1:17	
11/06/2006 02:05	11/06/2006 18:06	16:02	1
11/08/2006 17:09	11/09/2006 13:08	20:00	1
11/09/2006 18:36	11/09/2006 19:21	0:46	
12/01/2006 17:39	12/01/2006 18:37	0:59	
12/22/2006 02:59	12/22/2006 08:35	5:37	
12/22/2006 11:06	12/22/2006 13:06	2:01	
12/25/2006 16:48	12/28/2006 02:29	57:42	1
02/04/2007 11:42	02/04/2007 13:03	1:22	
02/04/2007 19:34	02/04/2007 20:15	0:42	
02/05/2007 09:17	02/06/2007 08:33	23:17	

Table 3. Exceedances of the Minimum Rotary Kiln Temperature OPL

Start Date/Time	End Date/Time	Duration (hh:mm)	Note
02/06/2007 12:23	02/06/2007 13:32	1:10	

Note 1: Ross may have been in start up or shut down during this exceedance.

Table 4. Exceedances of the Minimum Main Chamber Temperature OPL

Start Date/Time	End Date/Time	Duration (hh:mm)	Note
10/30/2004 22:28	10/31/2004 01:50	3:23	
11/05/2004 11:31	11/05/2004 12:32	1:02	
11/28/2004 02:43	11/28/2004 03:07	0:25	
12/06/2004 23:51	12/07/2004 05:02	5:12	
12/13/2004 00:35	12/13/2004 13:03	12:29	
12/15/2004 17:23	12/17/2004 03:58	10:36	
01/26/2005 18:15	01/27/2005 01:57	7:43	1
02/17/2005 19:52	02/18/2005 03:02	7:11	
02/25/2005 19:11	02/25/2005 19:25	0:15	
03/14/2005 02:03	03/15/2005 14:20	36:18	1
03/16/2005 14:45	03/17/2005 19:22	28:38	
03/19/2005 13:21	03/19/2005 13:48	0:28	
04/14/2005 20:56	04/15/2005 02:14	5:19	
04/18/2005 22:36	04/19/2005 03:24	4:49	
04/29/2005 15:54	04/29/2005 17:27	1:34	
06/05/2005 20:31	06/09/2005 14:34	90:04	1
06/09/2005 23:31	06/09/2005 23:50	0:20	
06/29/2005 21:57	06/29/2005 22:41	0:45	
07/03/2005 22:12	07/03/2005 22:33	0:22	
07/15/2005 22:14	07/15/2005 23:51	1:38	
07/25/2005 22:02	07/25/2005 22:03	0:02	
07/25/2005 22:06	07/25/2005 22:15	0:10	
08/03/2005 08:34	08/03/2005 19:54	11:21	
08/08/2005 02:24	08/09/2005 14:16	35:53	1
08/24/2005 06:04	08/24/2005 09:49	3:46	
09/07/2005 23:13	09/08/2005 10:23	11:11	1
11/10/2005 02:06	11/10/2005 05:52	3:47	
12/27/2005 18:17	12/28/2005 18:48	24:32	1
01/03/2006 03:07	01/03/2006 13:56	10:50	1
01/05/2006 13:09	01/06/2006 23:59	34:51	1
01/17/2006 16:48	01/17/2006 17:11	0:24	
02/17/2006 08:52	02/17/2006 09:29	0:38	
03/12/2006 22:09	03/13/2006 03:02	4:54	
03/23/2006 22:31	03/24/2006 11:21	12:51	1

Table 4. Exceedances of the Minimum Main Chamber Temperature OPL

Start Date/Time	End Date/Time	Duration (hh:mm)	Note
03/24/2006 11:36	03/24/2006 22:01	10:26	1
04/03/2006 00:50	04/04/2006 10:10	33:21	1
04/09/2006 13:20	04/09/2006 13:34	0:15	
04/09/2006 13:36	04/09/2006 13:36	0:01	
04/09/2006 13:38	04/09/2006 13:41	0:04	
04/09/2006 13:45	04/09/2006 13:45	0:01	
04/09/2006 13:49	04/09/2006 13:51	0:03	
04/09/2006 13:59	04/09/2006 17:01	3:03	
04/15/2006 17:38	04/15/2006 23:40	6:03	
04/22/2006 04:58	04/22/2006 05:15	0:18	
04/22/2006 05:17	04/22/2006 07:16	2:00	
05/09/2006 23:05	05/09/2006 23:41	0:37	
05/10/2006 04:13	05/11/2006 11:56	31:44	1
06/26/2006 00:52	06/26/2006 08:57	8:06	
06/28/2006 21:00	06/29/2006 20:04	23:05	1
06/29/2006 20:06	06/29/2006 21:51	1:46	
08/12/2006 00:46	08/12/2006 10:51	10:06	
09/13/2006 12:32	09/13/2006 17:56	5:25	
10/17/2006 04:48	10/17/2006 23:07	18:20	1
11/03/2006 11:38	11/03/2006 13:42	2:05	
11/06/2006 00:41	11/06/2006 01:40	1:00	
11/06/2006 02:31	11/06/2006 18:06	15:36	1
11/08/2006 17:09	11/09/2006 15:07	21:59	1
11/09/2006 18:26	11/09/2006 19:33	1:08	
12/01/2006 17:05	12/01/2006 18:47	1:43	
12/01/2006 19:29	12/01/2006 20:19	0:51	
12/22/2006 02:11	12/22/2006 08:59	6:49	
12/22/2006 10:27	12/22/2006 13:40	3:14	
12/25/2006 16:49	12/28/2006 02:54	58:06	1
12/28/2006 08:21	12/28/2006 09:32	1:12	1
02/05/2007 08:53	02/06/2007 08:47	23:55	

Note 1: Ross may have been in start up or shut down during this exceedance.

Table 5. Exceedances of the Maximum Flue Gas Flow Rate OPL

Start Date/Time	End Date/Time	Duration (hh:mm)	Note
10/02/2004 17:42	10/02/2004 17:49	0:08	
10/07/2004 00:59	10/07/2004 01:03	0:05	
01/03/2005 12:14	01/03/2005 12:20	0:07	
03/17/2005 12:15	03/17/2005 12:47	0:33	

Table 5. Exceedances of the Maximum Flue Gas Flow Rate OPL

Start Date/Time	End Date/Time	Duration (hh:mm)	Note
04/14/2005 22:19	04/14/2005 22:25	0:07	
04/29/2005 17:08	04/29/2005 17:12	0:05	
10/05/2005 22:02	10/05/2005 22:02	0:01	
10/20/2005 22:30	10/20/2005 22:45	0:16	
01/07/2006 01:06	01/07/2006 01:06	0:01	
01/17/2006 11:57	01/17/2006 16:05	4:09	
02/09/2006 19:57	02/10/2006 00:44	4:48	
02/23/2006 11:40	02/23/2006 11:41	0:02	
03/12/2006 21:07	03/12/2006 21:31	0:25	
04/03/2006 08:21	04/03/2006 08:43	0:23	
04/09/2006 13:45	04/09/2006 13:45	0:01	
04/10/2006 14:13	04/10/2006 14:51	0:39	
05/09/2006 09:40	05/09/2006 12:04	2:25	
05/09/2006 12:48	05/09/2006 14:00	1:13	
05/09/2006 14:38	05/09/2006 15:58	1:21	
05/09/2006 16:14	05/09/2006 19:55	3:42	
05/09/2006 20:21	05/09/2006 23:06	2:46	
05/10/2006 00:23	05/10/2006 01:29	1:07	
06/26/2006 05:02	06/26/2006 08:57	3:56	1
06/30/2006 02:32	06/30/2006 02:37	0:06	
07/09/2006 16:48	07/09/2006 16:51	0:04	
07/28/2006 16:21	07/28/2006 17:37	1:17	
11/09/2006 17:40	11/09/2006 17:40	0:01	

Note 1: Ross may have been in start up or shut down during this exceedance.

Table 6. Exceedances of the Maximum Total MC Waste Feed Rate OPL

Start Date/Time	End Date/Time	Duration (hh:mm)	Note
11/17/2005 17:26	11/17/2005 17:30	0:05	
02/09/2006 21:05	02/09/2006 21:32	0:28	
02/09/2006 21:36	02/09/2006 22:04	0:29	
02/09/2006 22:07	02/09/2006 22:34	0:28	
02/09/2006 22:42	02/09/2006 23:06	0:25	
02/09/2006 23:14	02/09/2006 23:41	0:28	
02/09/2006 23:44	02/10/2006 00:12	0:29	
05/09/2006 11:47	05/09/2006 11:52	0:06	
05/09/2006 15:16	05/09/2006 15:18	0:03	
05/09/2006 18:17	05/09/2006 18:21	0:05	
05/09/2006 19:47	05/09/2006 19:49	0:03	
05/09/2006 21:16	05/09/2006 21:17	0:02	

Table 7. Exceedance of the Maximum Total Main Chamber Pumpable Waste Feed Rate OPL

Start Date/Time	End Date/Time	Duration (hh:mm)	Note
02/09/2006 19:03	02/10/2006 00:14	5:12	

Table 8. Exceedances of the Minimum Rotary Kiln Lance Atomizing Air Pressure OPL

Start Date/Time	End Date/Time	Duration (hh:mm)	Note
10/30/2004 21:12	10/30/2004 23:40	2:29	
11/05/2004 10:28	11/05/2004 11:29	1:02	
11/28/2004 01:47	11/28/2004 02:36	0:50	
01/26/2005 17:28	01/26/2005 17:38	0:11	1
01/26/2005 18:05	01/26/2005 18:07	0:03	1
01/26/2005 18:25	01/26/2005 22:36	4:12	1
01/27/2005 00:32	01/27/2005 00:34	0:03	1
01/28/2005 08:56	01/28/2005 08:57	0:02	1
02/12/2005 22:21	02/12/2005 22:39	0:19	
02/12/2005 22:41	02/12/2005 22:44	0:04	
02/17/2005 19:17	02/18/2005 00:01	4:45	
02/24/2005 16:47	02/24/2005 16:59	0:13	
02/25/2005 18:18	02/25/2005 18:46	0:29	
03/14/2005 11:15	03/15/2005 14:20	27:06	1
03/16/2005 14:45	03/17/2005 02:02	11:18	
03/17/2005 04:47	03/17/2005 04:56	0:10	
03/17/2005 09:59	03/17/2005 09:59	0:01	
03/17/2005 11:40	03/17/2005 11:40	0:01	
03/17/2005 11:49	03/17/2005 11:49	0:01	
03/17/2005 12:04	03/17/2005 12:04	0:01	
03/17/2005 15:47	03/17/2005 16:02	0:16	
03/17/2005 16:06	03/17/2005 16:07	0:02	
03/18/2005 10:50	03/18/2005 11:00	0:11	
03/19/2005 12:37	03/19/2005 13:00	0:24	
03/27/2005 16:46	03/27/2005 17:00	0:15	
03/27/2005 18:36	03/27/2005 18:42	0:07	
04/09/2005 10:11	04/09/2005 10:12	0:02	
04/09/2005 10:31	04/09/2005 10:32	0:02	
04/09/2005 10:49	04/09/2005 10:57	0:09	
04/09/2005 12:05	04/09/2005 12:05	0:01	
04/09/2005 12:09	04/09/2005 12:13	0:05	
04/14/2005 19:27	04/14/2005 19:27	0:01	
04/14/2005 20:12	04/14/2005 21:17	1:06	
04/14/2005 21:26	04/14/2005 21:26	0:01	

Table 8. Exceedances of the Minimum Rotary Kiln Lance Atomizing Air Pressure OPL

Start Date/Time	End Date/Time	Duration (hh:mm)	Note
04/18/2005 21:48	04/18/2005 23:12	1:25	
04/18/2005 23:51	04/18/2005 23:54	0:04	
04/19/2005 00:01	04/19/2005 00:04	0:04	
04/25/2005 21:01	04/25/2005 21:01	0:01	
04/29/2005 15:06	04/29/2005 16:09	1:04	
04/29/2005 16:17	04/29/2005 16:17	0:01	
05/11/2005 17:28	05/11/2005 17:31	0:04	
05/21/2005 16:44	05/21/2005 16:47	0:04	
05/21/2005 17:06	05/21/2005 17:09	0:04	
06/02/2005 18:15	06/02/2005 18:17	0:03	
06/18/2005 06:55	06/18/2005 06:55	0:01	
06/29/2005 21:28	06/29/2005 21:44	0:17	
07/12/2005 23:21	07/12/2005 23:24	0:04	
07/14/2005 15:27	07/14/2005 15:27	0:01	
07/15/2005 21:39	07/15/2005 22:35	0:57	
07/18/2005 15:56	07/18/2005 15:56	0:01	
07/19/2005 19:43	07/19/2005 19:50	0:08	
07/25/2005 21:13	07/25/2005 21:27	0:15	
07/27/2005 04:40	07/27/2005 04:40	0:01	
07/27/2005 08:54	07/27/2005 08:54	0:01	
08/04/2005 22:12	08/04/2005 22:17	0:06	
08/07/2005 08:10	08/07/2005 08:10	0:01	
08/08/2005 01:53	08/09/2005 05:12	27:20	1
08/09/2005 12:11	08/09/2005 12:11	0:01	
08/09/2005 12:16	08/09/2005 12:16	0:01	
08/09/2005 12:51	08/09/2005 12:51	0:01	
08/17/2005 10:31	08/17/2005 10:31	0:01	
08/30/2005 12:45	08/30/2005 12:45	0:01	
08/30/2005 16:43	08/30/2005 16:46	0:04	
08/30/2005 17:44	08/30/2005 17:44	0:01	
08/30/2005 19:06	08/30/2005 19:06	0:01	
08/30/2005 19:11	08/30/2005 19:14	0:04	
09/07/2005 22:42	09/08/2005 05:01	6:20	1
09/08/2005 06:00	09/08/2005 06:08	0:09	
09/25/2005 12:29	09/25/2005 12:57	0:29	1
10/20/2005 21:24	10/20/2005 21:31	0:08	
11/08/2005 15:36	11/08/2005 16:01	0:26	
11/09/2005 17:04	11/09/2005 17:10	0:07	
11/10/2005 01:31	11/10/2005 04:08	2:38	
12/27/2005 17:46	12/28/2005 13:18	19:33	1
02/05/2006 06:34	02/05/2006 06:39	0:06	
02/17/2006 08:18	02/17/2006 08:45	0:28	

Table 8. Exceedances of the Minimum Rotary Kiln Lance Atomizing Air Pressure OPL

Start Date/Time	End Date/Time	Duration (hh:mm)	Note
03/12/2006 21:35	03/12/2006 23:41	2:07	
03/23/2006 22:04	03/24/2006 11:21	13:18	1
03/24/2006 11:36	03/24/2006 15:04	3:29	1
04/06/2006 17:30	04/06/2006 20:58	3:29	
04/09/2006 14:02	04/09/2006 14:25	0:24	
04/15/2006 17:02	04/15/2006 19:12	2:11	
04/15/2006 19:16	04/15/2006 19:16	0:01	
04/15/2006 19:18	04/15/2006 19:18	0:01	
04/15/2006 19:46	04/15/2006 19:48	0:03	
04/15/2006 19:51	04/15/2006 19:53	0:03	
04/15/2006 20:00	04/15/2006 20:17	0:18	
04/21/2006 20:35	04/21/2006 20:42	0:08	
04/22/2006 04:03	04/22/2006 04:28	0:26	
04/22/2006 04:36	04/22/2006 05:03	0:28	
04/28/2006 13:43	04/28/2006 13:53	0:11	
05/03/2006 19:21	05/03/2006 19:29	0:09	
05/12/2006 13:20	05/12/2006 13:26	0:07	
05/22/2006 20:39	05/22/2006 20:48	0:10	
05/24/2006 13:25	05/24/2006 13:30	0:06	
06/06/2006 20:18	06/06/2006 20:24	0:07	
06/07/2006 06:16	06/07/2006 06:16	0:01	
06/22/2006 02:31	06/22/2006 02:53	0:23	
06/23/2006 16:21	06/23/2006 16:29	0:09	1
07/14/2006 10:42	07/14/2006 10:46	0:05	
07/26/2006 01:33	07/26/2006 01:33	0:01	
07/28/2006 08:42	07/28/2006 08:45	0:04	
07/29/2006 01:59	07/29/2006 02:00	0:02	
08/12/2006 07:55	08/12/2006 10:51	2:57	1
10/17/2006 04:22	10/17/2006 17:05	12:44	1
11/02/2006 17:45	11/02/2006 17:48	0:04	
11/03/2006 11:06	11/03/2006 11:40	0:35	
11/03/2006 20:34	11/03/2006 20:52	0:19	
11/05/2006 21:09	11/05/2006 21:09	0:01	
11/06/2006 00:22	11/06/2006 00:24	0:03	
11/06/2006 00:28	11/06/2006 00:30	0:03	
11/06/2006 02:16	11/06/2006 02:16	0:01	1
11/06/2006 02:21	11/06/2006 02:23	0:03	1
11/06/2006 02:26	11/06/2006 02:28	0:03	1
11/06/2006 02:32	11/06/2006 02:34	0:03	1
11/06/2006 02:41	11/06/2006 02:43	0:03	1
11/06/2006 02:47	11/06/2006 02:48	0:02	1
11/06/2006 02:52	11/06/2006 02:54	0:03	1

Table 8. Exceedances of the Minimum Rotary Kiln Lance Atomizing Air Pressure OPL

Start Date/Time	End Date/Time	Duration (hh:mm)	Note
11/06/2006 03:24	11/06/2006 03:24	0:01	1
11/06/2006 03:29	11/06/2006 03:30	0:02	1
11/06/2006 03:45	11/06/2006 03:46	0:02	1
11/06/2006 03:48	11/06/2006 03:48	0:01	1
11/06/2006 03:51	11/06/2006 03:51	0:01	1
11/06/2006 03:57	11/06/2006 04:12	0:16	1
11/06/2006 10:32	11/06/2006 18:06	7:35	1
12/01/2006 16:48	12/01/2006 16:53	0:06	
12/01/2006 17:28	12/01/2006 17:42	0:15	
12/01/2006 19:13	12/01/2006 19:27	0:15	
12/22/2006 01:45	12/22/2006 02:02	0:18	
12/22/2006 02:17	12/22/2006 06:31	4:15	
12/22/2006 10:04	12/22/2006 11:40	1:37	
12/28/2006 07:57	12/28/2006 08:37	0:41	1

Note 1: Ross may have been in start up or shut down during this exceedance.

Table 9. Exceedances of the Minimum Main Chamber Burner Atomizing Air Pressure OPL

Start Date/Time	End Date/Time	Duration (hh:mm)	Note
10/30/2004 21:12	10/30/2004 23:40	2:29	
11/05/2004 10:28	11/05/2004 11:29	1:02	
11/28/2004 01:47	11/28/2004 02:36	0:50	
01/26/2005 18:06	01/26/2005 18:07	0:02	1
01/26/2005 18:25	01/26/2005 22:36	4:12	1
01/27/2005 00:32	01/27/2005 00:34	0:03	1
01/28/2005 08:56	01/28/2005 08:57	0:02	1
02/12/2005 22:21	02/12/2005 22:39	0:19	
02/12/2005 22:41	02/12/2005 22:44	0:04	
02/17/2005 19:17	02/18/2005 00:01	4:45	
02/24/2005 16:47	02/24/2005 16:59	0:13	
02/25/2005 18:18	02/25/2005 18:48	0:31	
03/14/2005 11:15	03/15/2005 14:20	27:06	1
03/17/2005 04:47	03/17/2005 04:56	0:10	
03/17/2005 11:40	03/17/2005 11:40	0:01	
03/17/2005 11:49	03/17/2005 11:49	0:01	
03/17/2005 12:04	03/17/2005 12:04	0:01	
03/17/2005 15:47	03/17/2005 16:02	0:16	
03/17/2005 16:06	03/17/2005 16:07	0:02	

Table 9. Exceedances of the Minimum Main Chamber Burner Atomizing Air Pressure OPL

Start Date/Time	End Date/Time	Duration (hh:mm)	Note
03/19/2005 12:37	03/19/2005 13:00	0:24	
03/27/2005 16:46	03/27/2005 17:00	0:15	
03/27/2005 18:36	03/27/2005 18:42	0:07	
04/09/2005 10:11	04/09/2005 10:12	0:02	
04/09/2005 10:31	04/09/2005 10:32	0:02	
04/09/2005 10:49	04/09/2005 10:57	0:09	
04/09/2005 12:05	04/09/2005 12:05	0:01	
04/09/2005 12:09	04/09/2005 12:13	0:05	
04/14/2005 19:27	04/14/2005 19:27	0:01	
04/14/2005 20:12	04/14/2005 21:17	1:06	
04/14/2005 21:25	04/14/2005 21:26	0:02	
04/18/2005 21:48	04/18/2005 23:12	1:25	
04/18/2005 23:51	04/18/2005 23:54	0:04	
04/19/2005 00:01	04/19/2005 00:03	0:03	
04/25/2005 21:01	04/25/2005 21:01	0:01	
04/29/2005 15:06	04/29/2005 16:09	1:04	
04/29/2005 16:17	04/29/2005 16:17	0:01	
05/11/2005 17:27	05/11/2005 17:32	0:06	
05/21/2005 16:44	05/21/2005 16:47	0:04	
05/21/2005 17:06	05/21/2005 17:09	0:04	
06/02/2005 18:15	06/02/2005 18:17	0:03	
06/26/2005 00:24	06/26/2005 00:24	0:01	
06/29/2005 21:28	06/29/2005 21:44	0:17	
07/03/2005 21:19	07/03/2005 21:57	0:39	
07/06/2005 14:13	07/06/2005 14:13	0:01	
07/06/2005 16:03	07/06/2005 16:03	0:01	
07/06/2005 23:29	07/06/2005 23:29	0:01	
07/12/2005 23:21	07/12/2005 23:25	0:05	
07/14/2005 15:27	07/14/2005 15:27	0:01	
07/15/2005 21:39	07/15/2005 22:35	0:57	
07/16/2005 19:12	07/16/2005 19:15	0:04	
07/17/2005 16:01	07/17/2005 16:01	0:01	
07/18/2005 13:22	07/18/2005 13:22	0:01	
07/18/2005 15:17	07/18/2005 15:17	0:01	
07/18/2005 15:42	07/18/2005 15:42	0:01	
07/19/2005 19:43	07/19/2005 19:50	0:08	
07/25/2005 10:02	07/25/2005 10:28	0:27	
07/25/2005 21:13	07/25/2005 21:27	0:15	
07/27/2005 04:40	07/27/2005 04:40	0:01	
07/27/2005 08:54	07/27/2005 08:54	0:01	
08/03/2005 08:18	08/03/2005 12:39	4:22	1
08/04/2005 22:12	08/04/2005 22:17	0:06	

Table 9. Exceedances of the Minimum Main Chamber Burner Atomizing Air Pressure OPL

Start Date/Time	End Date/Time	Duration (hh:mm)	Note
08/08/2005 01:53	08/08/2005 01:54	0:02	1
08/08/2005 13:25	08/09/2005 05:12	15:48	1
08/09/2005 12:11	08/09/2005 12:11	0:01	
08/09/2005 12:16	08/09/2005 12:16	0:01	
08/09/2005 12:51	08/09/2005 12:51	0:01	
08/19/2005 19:31	08/19/2005 19:34	0:04	
08/19/2005 19:49	08/19/2005 19:51	0:03	
08/30/2005 16:43	08/30/2005 16:46	0:04	
08/30/2005 18:39	08/30/2005 18:39	0:01	
08/30/2005 19:11	08/30/2005 19:14	0:04	
09/04/2005 22:33	09/04/2005 22:34	0:02	1
09/07/2005 22:42	09/08/2005 05:01	6:20	1
09/25/2005 12:29	09/25/2005 12:57	0:29	1
10/20/2005 21:24	10/20/2005 21:31	0:08	
11/08/2005 15:36	11/08/2005 16:01	0:26	
11/09/2005 17:04	11/09/2005 17:10	0:07	
11/10/2005 01:31	11/10/2005 04:08	2:38	
12/27/2005 17:46	12/28/2005 13:18	19:33	1
02/05/2006 06:34	02/05/2006 06:39	0:06	
02/17/2006 08:18	02/17/2006 08:45	0:28	
03/12/2006 21:35	03/12/2006 23:41	2:07	
03/23/2006 22:05	03/24/2006 11:21	13:17	1
03/24/2006 11:36	03/24/2006 15:04	3:29	1
04/06/2006 17:30	04/06/2006 20:58	3:29	
04/09/2006 14:03	04/09/2006 14:25	0:23	
04/14/2006 23:13	4/14/2006 23:22	0:10	
04/15/2006 17:02	04/15/2006 19:12	2:11	
04/15/2006 19:16	04/15/2006 19:16	0:01	
04/15/2006 19:18	04/15/2006 19:18	0:01	
04/15/2006 19:46	04/15/2006 19:47	0:02	
04/15/2006 19:51	04/15/2006 19:52	0:02	
04/15/2006 19:59	04/15/2006 20:17	0:19	
04/21/2006 20:35	04/21/2006 20:42	0:08	1
04/22/2006 04:36	04/22/2006 05:03	0:28	
04/28/2006 13:43	04/28/2006 13:52	0:10	
05/03/2006 19:21	05/03/2006 19:28	0:08	
05/12/2006 13:20	05/12/2006 13:26	0:07	
05/22/2006 20:39	05/22/2006 20:48	0:10	
05/24/2006 13:25	05/24/2006 13:30	0:06	
06/06/2006 20:17	06/06/2006 20:24	0:08	
06/07/2006 06:16	06/07/2006 06:16	0:01	
06/22/2006 02:31	06/22/2006 02:53	0:23	

Table 9. Exceedances of the Minimum Main Chamber Burner Atomizing Air Pressure OPL

Start Date/Time	End Date/Time	Duration (hh:mm)	Note
06/23/2006 16:21	06/23/2006 16:29	0:09	1
07/14/2006 10:42	07/14/2006 10:46	0:05	
07/26/2006 01:33	07/26/2006 01:33	0:01	
07/28/2006 08:42	07/28/2006 08:45	0:04	
07/29/2006 01:59	07/29/2006 02:00	0:02	
08/12/2006 07:55	08/12/2006 10:51	2:57	1
10/17/2006 04:22	10/17/2006 17:05	12:44	1
11/02/2006 17:45	11/02/2006 17:48	0:04	
11/03/2006 11:06	11/03/2006 11:40	0:35	
11/03/2006 20:34	11/03/2006 20:52	0:19	
11/06/2006 00:22	11/06/2006 00:24	0:03	
11/06/2006 00:28	11/06/2006 00:30	0:03	
11/06/2006 02:16	11/06/2006 02:16	0:01	1
11/06/2006 02:21	11/06/2006 02:23	0:03	1
11/06/2006 02:26	11/06/2006 02:28	0:03	1
11/06/2006 02:32	11/06/2006 02:34	0:03	1
11/06/2006 02:41	11/06/2006 02:43	0:03	1
11/06/2006 02:47	11/06/2006 02:48	0:02	1
11/06/2006 02:52	11/06/2006 02:54	0:03	1
11/06/2006 03:24	11/06/2006 03:24	0:01	1
11/06/2006 03:29	11/06/2006 03:30	0:02	1
11/06/2006 03:45	11/06/2006 03:45	0:01	1
11/06/2006 03:48	11/06/2006 03:48	0:01	1
11/06/2006 03:51	11/06/2006 03:51	0:01	1
11/06/2006 03:57	11/06/2006 04:12	0:16	1
12/01/2006 16:48	12/01/2006 16:53	0:06	
12/01/2006 17:28	12/01/2006 17:42	0:15	
12/01/2006 19:13	12/01/2006 19:27	0:15	
12/22/2006 01:45	12/22/2006 02:02	0:18	
12/22/2006 02:17	12/22/2006 06:31	4:15	
12/22/2006 10:04	12/22/2006 11:40	1:37	
12/28/2006 07:57	12/28/2006 08:37	0:41	1

Note 1: Ross may have been in start up or shut down during this exceedance.

Table 10. Exceedances of the Maximum Mercury Feed Rate OPL

Start Date/Time	End Date/Time	Duration (hh:mm)
02/25/2007 00:57	02/25/2007 16:42	15:45
02/25/2007 23:47	02/26/2007 16:13	16:26

Table 11. Exceedances of the Minimum RFS DP OPL

Start Date/Time	End Date/Time	Duration (hh:mm)	Note
10/02/2004 17:14	10/02/2004 17:27	0:14	
10/30/2004 21:26	10/31/2004 00:21	2:56	
11/05/2004 10:44	11/05/2004 12:14	1:31	
11/28/2004 02:03	11/28/2004 03:19	1:17	
01/26/2005 19:10	01/26/2005 23:25	4:16	
02/12/2005 22:38	02/12/2005 23:29	0:52	
02/17/2005 19:37	02/18/2005 01:07	5:31	
03/14/2005 11:30	03/15/2005 14:20	26:51	1
03/19/2005 12:56	03/19/2005 13:42	0:47	
04/14/2005 20:28	04/14/2005 21:49	1:22	
04/18/2005 22:05	04/18/2005 23:55	1:51	
04/29/2005 15:20	04/29/2005 16:58	1:39	
06/05/2005 19:33	06/09/2005 00:31	76:59	1
06/29/2005 21:43	06/29/2005 22:29	0:47	
07/03/2005 21:36	07/03/2005 22:42	1:07	
07/15/2005 21:54	07/15/2005 23:20	1:27	
07/25/2005 10:19	07/25/2005 11:12	0:54	
08/08/2005 02:03	08/09/2005 06:01	27:59	1
08/24/2005 06:04	08/24/2005 07:52	1:49	
09/07/2005 23:23	09/08/2005 05:41	6:19	
09/23/2005 18:30	09/25/2005 09:48	39:19	1
09/25/2005 12:46	09/25/2005 13:29	0:44	
11/08/2005 15:55	11/08/2005 16:43	0:49	
11/10/2005 01:55	11/10/2005 04:52	2:58	
11/17/2005 20:27	11/17/2005 20:38	0:12	
12/27/2005 18:25	12/28/2005 13:59	19:35	1
01/17/2006 15:06	01/17/2006 15:10	0:05	
01/17/2006 15:16	01/17/2006 15:23	0:08	
01/17/2006 16:06	01/17/2006 16:18	0:13	
02/09/2006 22:23	02/09/2006 22:45	0:23	
02/17/2006 08:37	02/17/2006 09:24	0:48	
03/12/2006 22:50	03/13/2006 00:22	1:33	
03/23/2006 22:18	03/24/2006 11:21	13:04	1
03/24/2006 11:36	03/24/2006 15:44	4:09	
04/05/2006 21:43	04/06/2006 04:42	7:00	
04/06/2006 17:47	04/06/2006 21:40	3:54	
04/15/2006 17:27	04/15/2006 19:48	2:22	
04/22/2006 04:26	04/22/2006 04:28	0:03	
04/22/2006 04:36	04/22/2006 05:15	0:40	
04/22/2006 05:17	04/22/2006 05:49	0:33	
05/09/2006 10:21	05/09/2006 10:44	0:24	
05/09/2006 17:08	05/09/2006 17:11	0:04	
05/09/2006 20:48	05/09/2006 21:05	0:18	

Table 11. Exceedances of the Minimum RFS DF OPL

Start Date/Time	End Date/Time	Duration (hh:mm)	Note
05/09/2006 21:09	05/09/2006 21:26	0:18	
05/09/2006 22:30	05/09/2006 23:35	1:06	
05/10/2006 07:21	05/11/2006 02:45	19:25	
06/22/2006 02:44	06/22/2006 03:33	0:50	
06/28/2006 21:00	06/29/2006 11:15	14:16	
08/12/2006 08:14	08/12/2006 10:51	2:38	1
09/13/2006 12:32	09/13/2006 12:49	0:18	
10/17/2006 04:43	10/17/2006 17:43	13:01	1
11/03/2006 11:13	11/03/2006 12:30	1:18	
11/03/2006 20:44	11/03/2006 21:40	0:57	
11/06/2006 10:36	11/06/2006 18:06	7:31	1
11/08/2006 17:09	11/09/2006 01:34	8:26	
12/01/2006 17:43	12/01/2006 17:46	0:04	
12/22/2006 02:21	12/22/2006 07:15	4:55	
12/22/2006 10:26	12/22/2006 12:20	1:55	
12/26/2006 03:08	12/27/2006 17:53	38:46	1
12/28/2006 08:22	12/28/2006 09:13	0:52	1
02/17/2007 00:41	02/17/2007 05:15	4:35	

Note 1: Ross may have been in start up or shut down during this exceedance.

Table 12. Exceedances of the Maximum Closed Loop Solids Content OPL

Start Date/Time	End Date/Time	Duration (hh:mm)	Note
01/15/2005 23:56	01/17/2005 20:41	44:46	1
02/18/2005 00:14	02/18/2005 09:47	9:34	
05/06/2006 03:14	05/08/2006 17:45	62:32	
05/09/2006 19:49	05/11/2006 13:03	41:15	1

Note 1: Ross may have been in start up or shut down during this exceedance.

Table 13. Exceedances of the Minimum RFS L/G OPL

Table 13. Exceedances of the Minimum RFS L/G OPL

Start Date/Time	End Date/Time	Duration (hh:mm)	Note
10/02/2004 17:35	10/02/2004 17:38	0:04	
11/03/2004 17:06	11/03/2004 17:27	0:22	
11/06/2004 02:18	11/06/2004 02:53	0:36	

Table 13. Exceedances of the Minimum RFS L/G OPL

Start Date/Time	End Date/Time	Duration (hh:mm)	Note
12/16/2004 10:09	12/16/2004 11:52	1:44	
12/16/2004 15:12	12/17/2004 02:57	11:46	
12/27/2004 19:12	12/27/2004 19:24	0:13	
02/19/2005 07:18	02/19/2005 07:24	0:07	
02/23/2005 19:08	02/23/2005 19:27	0:20	
03/17/2005 11:59	03/17/2005 13:23	1:25	
03/22/2005 01:30	03/22/2005 01:49	0:20	
03/25/2005 12:47	03/25/2005 13:04	0:18	
04/14/2005 22:19	04/14/2005 22:24	0:06	
06/12/2005 15:54	06/12/2005 16:09	0:16	
07/02/2005 01:13	07/02/2005 01:25	0:13	
07/10/2005 00:22	07/10/2005 00:43	0:22	
07/20/2005 18:01	07/20/2005 18:24	0:24	
08/04/2005 15:36	08/06/2005 16:07	48:32	1
09/08/2005 05:50	09/08/2005 06:56	1:07	
09/08/2005 07:08	09/08/2005 07:09	0:02	
09/23/2005 18:30	09/25/2005 09:32	39:03	1
11/17/2005 11:38	11/17/2005 17:10	5:33	
11/17/2005 17:19	11/17/2005 17:19	0:01	
11/17/2005 19:26	11/17/2005 22:18	2:53	
01/17/2006 11:51	01/17/2006 16:31	4:41	
02/09/2006 20:09	02/10/2006 00:20	4:12	
04/06/2006 13:50	04/06/2006 21:06	7:17	
04/07/2006 22:52	04/07/2006 22:54	0:03	
04/08/2006 01:46	04/08/2006 01:58	0:13	
04/08/2006 03:39	04/08/2006 06:22	2:44	
04/08/2006 09:42	04/08/2006 10:13	0:32	
04/08/2006 11:47	04/08/2006 12:02	0:16	
04/08/2006 19:50	04/08/2006 22:14	2:25	
04/08/2006 22:51	04/08/2006 23:40	0:50	
04/09/2006 00:41	04/09/2006 00:46	0:06	
04/09/2006 02:13	04/09/2006 06:30	4:18	
04/09/2006 07:47	04/09/2006 10:12	2:26	
04/09/2006 10:15	04/09/2006 11:18	1:04	
04/09/2006 13:08	04/09/2006 13:11	0:04	
04/09/2006 13:14	04/09/2006 13:14	0:01	
04/09/2006 13:17	04/09/2006 13:36	0:20	
04/09/2006 13:38	04/09/2006 13:41	0:04	
04/09/2006 13:45	04/09/2006 13:46	0:02	
04/09/2006 13:49	04/09/2006 13:51	0:03	
04/09/2006 13:59	04/09/2006 14:29	0:31	
04/09/2006 18:09	04/10/2006 00:30	6:22	
04/10/2006 01:29	04/10/2006 05:34	4:06	

Table 13. Exceedances of the Minimum RFS L/G OPL

Start Date/Time	End Date/Time	Duration (hh:mm)	Note
04/10/2006 08:35	04/10/2006 09:31	0:57	
04/10/2006 10:14	04/10/2006 11:17	1:04	
04/10/2006 14:46	04/10/2006 14:56	0:11	
04/10/2006 17:06	04/10/2006 17:49	0:44	
04/15/2006 19:32	04/15/2006 21:04	1:33	
05/09/2006 09:55	05/09/2006 11:50	1:56	
05/09/2006 12:37	05/09/2006 14:05	1:29	
05/09/2006 14:31	05/09/2006 20:06	5:36	
05/09/2006 20:46	05/09/2006 21:27	0:42	
05/09/2006 22:14	05/09/2006 23:08	0:55	
05/10/2006 00:31	05/10/2006 01:09	0:39	
10/16/2006 22:41	10/17/2006 17:03	18:23	1
10/18/2006 15:52	10/18/2006 16:55	1:04	
02/17/2007 00:41	02/17/2007 05:15	4:35	

Note 1: Ross may have been in start up or shut down during this exceedance.

Table 14. Exceedances of the Minimum Wet ESP #1 Power OPL

Start Date/Time	End Date/Time	Duration (hh:mm)	Note
08/12/2006 07:35	08/12/2006 10:51	3:17	
09/13/2006 12:37	09/13/2006 14:04	1:28	
09/13/2006 17:10	09/13/2006 17:19	0:10	
10/17/2006 07:47	10/17/2006 19:08	11:22	1
12/01/2006 18:28	12/01/2006 18:32	0:05	
12/01/2006 20:21	12/01/2006 20:31	0:11	
12/22/2006 03:27	12/22/2006 06:45	3:19	
12/22/2006 11:14	12/22/2006 12:33	1:20	
12/25/2006 22:05	12/28/2006 00:47	50:43	1
02/05/2007 12:11	02/05/2007 22:31	10:21	
02/17/2007 00:42	02/17/2007 05:15	4:34	

Note 1: Ross may have been in start up or shut down during this exceedance.

Table 15. Exceedances of the Minimum Wet ESP #2 Power OPL

Start Date/Time	End Date/Time	Duration (hh:mm)	Note
08/12/2006 07:17	08/12/2006 10:51	3:35	
09/13/2006 12:32	09/13/2006 14:21	1:50	
09/13/2006 16:53	09/13/2006 17:34	0:42	

Table 15. Exceedances of the Minimum Wet ESP #2 Power OPL

Start Date/Time	End Date/Time	Duration (hh:mm)	Note
10/17/2006 07:30	10/17/2006 19:27	11:58	1
12/01/2006 19:53	12/01/2006 20:39	0:47	
12/19/2006 11:04	12/19/2006 11:05	0:02	
12/22/2006 02:52	12/22/2006 06:59	4:08	
12/22/2006 10:57	12/22/2006 12:50	1:54	
12/25/2006 21:41	12/28/2006 01:05	51:25	1
02/05/2007 11:48	02/05/2007 22:48	11:01	
02/17/2007 00:42	02/17/2007 05:15	4:34	

Note 1: Ross may have been in start up or shut down during this exceedance.

Table 16. Exceedances of the Maximum Total Chlorine/Chloride Feed Rate OPL

Start Date/Time	End Date/Time	Duration (hh:mm)	Note
02/09/2006 23:05	02/10/2006 00:52	1:48	
05/09/2006 20:33	05/09/2006 20:34	0:02	
05/09/2006 20:48	05/09/2006 22:57	2:10	

Table 17. Exceedances of the Minimum Contactor DP OPL

Start Date/Time	End Date/Time	Duration (hh:mm)	Note
10/30/2004 22:04	10/30/2004 22:26	0:23	
10/30/2004 23:26	10/30/2004 23:43	0:18	
11/05/2004 11:23	11/05/2004 11:31	0:09	
01/26/2005 20:31	01/26/2005 22:45	2:15	
02/17/2005 20:12	02/18/2005 00:07	3:56	
03/14/2005 12:07	03/15/2005 14:20	26:14	1
04/18/2005 22:41	04/18/2005 23:20	0:40	
04/29/2005 16:00	04/29/2005 16:12	0:13	
06/26/2005 21:28	06/26/2005 21:57	0:30	
07/15/2005 22:24	07/15/2005 22:46	0:23	
08/08/2005 02:42	08/09/2005 05:14	26:33	1
08/24/2005 06:04	08/24/2005 07:34	1:31	
09/08/2005 00:00	09/08/2005 01:50	1:51	
09/08/2005 02:43	09/08/2005 05:08	2:26	
09/25/2005 12:29	09/25/2005 21:47	9:19	
11/10/2005 02:21	11/10/2005 04:19	1:59	
12/20/2005 12:33	12/20/2005 12:42	0:10	
12/27/2005 19:09	12/28/2005 13:25	18:17	1

Table 17. Exceedances of the Minimum Contactor DP OPL

Start Date/Time	End Date/Time	Duration (hh:mm)	Note
01/06/2006 12:38	01/06/2006 16:21	3:44	
03/12/2006 22:51	03/12/2006 23:57	1:07	
03/23/2006 23:01	03/24/2006 11:21	12:21	1
03/24/2006 11:36	03/24/2006 15:09	3:34	
04/06/2006 18:02	04/06/2006 21:13	3:12	
04/15/2006 17:50	04/15/2006 19:23	1:34	
04/22/2006 04:46	04/22/2006 05:15	0:30	
04/22/2006 05:17	04/22/2006 05:18	0:02	
05/10/2006 07:49	05/10/2006 11:06	3:18	
05/10/2006 14:10	05/11/2006 02:13	12:04	
06/28/2006 21:00	06/29/2006 11:02	14:03	1
08/12/2006 08:43	08/12/2006 10:51	2:09	
10/17/2006 05:16	10/17/2006 17:12	11:57	1
12/22/2006 02:42	12/22/2006 06:43	4:02	
12/22/2006 10:48	12/22/2006 11:54	1:07	
02/17/2007 00:42	02/17/2007 05:15	4:34	

Note 1: Ross may have been in start up or shut down during this exceedance.

Table 18. Exceedances of the Minimum GLC Outlet Scrubber Liquor pH OPL

Start Date/Time	End Date/Time	Duration (hh:mm)	Note
03/16/2005 14:45	03/17/2005 04:05	13:21	
04/14/2005 21:32	04/14/2005 22:31	1:00	
06/30/2005 19:24	06/30/2005 20:24	1:01	
09/25/2005 07:59	09/25/2005 12:27	4:29	1
09/25/2005 12:29	09/25/2005 16:22	3:54	1
11/17/2005 16:58	11/17/2005 23:32	6:35	
05/09/2006 20:03	05/09/2006 20:36	0:34	
12/05/2006 16:45	12/05/2006 17:00	0:16	
02/17/2007 00:41	02/17/2007 05:16	4:36	

Note 1: Ross may have been in start up or shut down during this exceedance.

Table 19. Exceedances of the Minimum GLC L/G OPL

Start Date/Time	End Date/Time	Duration (hh:mm)	Note
10/24/2004 11:14	10/24/2004 12:11	0:58	
10/25/2004 21:56	10/26/2004 06:49	8:54	
12/17/2004 20:18	12/17/2004 21:52	1:35	
12/18/2004 00:29	12/18/2004 01:30	1:02	
02/04/2005 14:03	02/04/2005 14:57	0:55	
02/06/2005 12:07	02/06/2005 14:45	2:39	
05/08/2005 21:18	05/08/2005 22:16	0:59	
05/29/2005 03:25	05/29/2005 04:24	1:00	
05/30/2005 21:50	05/30/2005 23:34	1:45	
07/17/2005 08:31	07/17/2005 09:32	1:02	
07/18/2005 19:29	07/18/2005 21:05	1:37	
08/09/2005 16:20	08/09/2005 17:17	0:58	
08/10/2005 10:22	08/10/2005 11:23	1:02	
08/10/2005 12:16	08/10/2005 13:28	1:13	
08/28/2005 06:09	08/28/2005 07:00	0:52	
09/25/2005 12:29	09/25/2005 12:56	0:28	
11/09/2005 23:12	11/09/2005 23:57	0:46	
11/17/2005 12:12	11/17/2005 12:12	0:01	
11/17/2005 12:23	11/17/2005 17:48	5:26	
11/17/2005 18:18	11/17/2005 22:08	3:51	
11/24/2005 22:32	11/24/2005 23:24	0:53	
11/24/2005 22:42	11/24/2005 23:15	0:34	
12/03/2005 06:59	12/03/2005 08:01	1:03	
12/07/2005 07:40	12/07/2005 08:32	0:53	
12/07/2005 14:52	12/07/2005 16:18	1:27	
01/17/2006 12:17	01/17/2006 16:09	3:53	
02/09/2006 20:11	02/10/2006 00:19	4:09	
02/21/2006 09:29	02/21/2006 10:15	0:47	
04/22/2006 08:59	04/22/2006 10:12	1:14	
04/22/2006 10:19	04/22/2006 10:47	0:29	
05/09/2006 10:01	05/09/2006 11:00	1:00	
05/09/2006 11:21	05/09/2006 11:59	0:39	
05/09/2006 13:01	05/09/2006 13:47	0:47	
05/09/2006 14:54	05/09/2006 17:33	2:40	
05/09/2006 18:01	05/09/2006 19:31	1:31	
05/09/2006 20:34	05/09/2006 21:33	1:00	
05/09/2006 22:20	05/09/2006 22:57	0:38	
05/10/2006 00:17	05/10/2006 00:30	0:14	
05/10/2006 00:39	05/10/2006 01:06	0:28	
05/24/2006 22:34	05/24/2006 23:28	0:55	
06/28/2006 21:00	06/29/2006 11:35	14:36	1
12/22/2006 02:09	12/22/2006 07:20	5:12	
12/22/2006 12:35	12/22/2006 12:38	0:04	

Table 19. Exceedances of the Minimum GLC L/G OPL

Start Date/Time	End Date/Time	Duration (hh:mm)	Note
12/25/2006 11:01	12/25/2006 11:22	0:22	
02/17/2007 00:41	02/17/2007 05:15	4:35	

Note 1: Ross may have been in start up or shut down during this exceedance.

Table 20. Exceedances of the Maximum Rotary Kiln Pressure OPL

Start Date/Time	End Date/Time	Duration (hh:mm)	Note
03/10/2005 21:45	03/10/2005 21:49	0:05	1
12/27/2005 18:08	12/27/2005 19:05	0:58	1
02/17/2006 08:50	02/17/2006 08:50	0:01	
03/12/2006 22:28	03/12/2006 23:01	0:34	
03/12/2006 23:17	03/12/2006 23:32	0:16	
03/23/2006 23:40	03/24/2006 01:13	1:34	- 1
04/21/2006 20:44	04/21/2006 20:45	0:02	
05/14/2006 02:59	05/14/2006 02:59	0:01	
06/20/2006 00:25	06/20/2006 00:32	0:08	
06/22/2006 19:54	06/22/2006 20:00	0:07	
12/22/2006 10:39	12/22/2006 10:44	0:06	

Note 1: Ross may have been in start up or shut down during this exceedance.

**CERTIFICATE OF MAILING**

I, Loretta Shaffer, certify that I sent a Notice and Finding of Violation, No. ERA-5-07-OH-23, by Certified Mail, Return Receipt Requested, to:

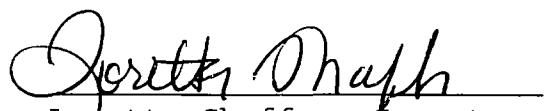
Mr. James Larson  
Vice President of Operations  
Ross Incineration Services, Inc.  
36790 Giles Road  
Grafton, Ohio 44044-9125

I also certify that I sent copies of the Finding of Violation and Notice of Violation by first class mail to:

Robert Hodanbosi, Chief  
Division of Air Pollution Control  
Ohio Environmental Protection Agency  
50 West Town Street, Suite 700  
Columbus, Ohio 43215

Dennis Bush, Supervisor  
Northeast District Office  
Ohio Environmental Protection Agency  
2110 East Aurora Road  
Twinsburg, Ohio 44087

on the 27<sup>th</sup> day of September, 2007

  
Loretta Shaffer  
Loretta Shaffer, Secretary  
AECAS, (MN/OH)

CERTIFIED MAIL RECEIPT NUMBER: 70010320000601877284